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Commandant United States Coast Guard

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2100 Second Street, S.W. Washington, DC 20593-0001 Staff Symbol: G-SCT-2 Phone: (202) 267- 2860

2400 August 151997

The Secretary
Federal Communications Commission
1919 M Street
Room 222
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Secretary:

In accordance with Section 1.401 of the FCC Rules, enclosed is an original and five copies of a Petition for Rulemaking requesting amendment of Part 80 of the Commission's Rules to Designate Maritime Frequencies for Automatic Identification Systems and Related Safety Systems. Any questions with regard to this petition should be addressed to the undersigned.

Sincerely,

J. D. HERSEY JR.

Chief, Spectrum Management Division

By direction

Encl:

(1) USCG Comments

Copy:

Roger Noel, Wireless Bureau

No. of Copies rec'd

Before The FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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| To the Metter of | , | FCO |
| In the Matter of |) | RM- |
| Amendment of Part 80 of the FCC Rules |) | |
| to Designate Maritime Channels and Allow |) | |
| Operation of Automatic Identification Systems |) | |
| and Related Safety Systems |) | |

PETITION FOR RULEMAKING

In accordance with Section 1.401 of the Commission's Rules, the U.S. Coast Guard respectfully submits this petition for rulemaking to establish and make available VHF maritime narrowband (interstitial) channels for Automatic Identification Systems (AIS) and related safety systems used in new and existing vessel traffic services (VTS) and in nationwide ports and waterways.

Introduction

1. The Congressionally-mandated Ports and Waterways Safety System (PAWSS) project provides Vessel Traffic Services to facilitate the safe and efficient transit of vessel traffic to prevent collisions, groundings, and environmental damage associated with these accidents. The project is a Department of Transportation (DOT), Level-1, major acquisition. PAWSS has been a joint-development effort by the U.S. Coast Guard and the maritime stakeholders in the United States through a national dialog process, which has established the need for a nationwide "transponder-based VTS." Accordingly, the U.S. Coast Guard is developing requirements and specifications for new VTS systems that include AIS. These requirements are also being included in the U.S. Coast Guard's VTS upgrade program, which is currently in progress. Related digital systems, such as future automatic broadcasts of safety information to ships, may also use these channels. Since the AIS transponder system has been determined to be the primary sensor in the system, frequencies are urgently needed to support these new requirements. These transponders

and related safety systems will require that at least two VHF marine band channels in each area be available for this use. As explained below, most practical candidates for these systems are derived from the VHF maritime public correspondence channels. Initially, the Coast Guard will purchase transponders that will be tested onboard selected vessels.

AIS Radio Assignments are Needed by Both Government and Non-Government to Meet a Maritime Safety Requirement

2. Under PAWSS, the Coast Guard has engaged in outreach efforts to develop a process for selecting ports and determining capabilities. This includes pursuing cooperative arrangements with stakeholders which may lead to partnerships between the U.S. Coast Guard and industry. Because the VTS upgrade program will include the use of non-government stations, frequencies assigned to PAWSS will be used by both Federal Government and non-Government ship and shore stations. None of these frequency assignments are intended for exclusive use by the government.

Channels Selected for AIS Must be Internationally Recognized for Maritime Use

3. The maritime mobile frequency band (156-174 MHz) supports maritime communications worldwide using 25 kHz channels. Appendix 18 of the International Telecommunications Union (ITU) Radio Regulations (RR) defines the channels of the maritime mobile service. These channels support a variety of communication functions, including public correspondence, intership and ship-to-coast, coast-to-ship, port operations, calling and various safety functions. Safety functions include distress, search-and-rescue, ship movement, navigation (bridge-to-bridge) communications, and maritime safety information broadcasts. Although most communications in the maritime mobile service have utilized analog FM techniques for voice communications, requirements for digital information exchange are now increasing substantially.

AIS Implementation Requires the use of Digital Channels

4. To that end, administrations are planning or have already begun implementing modern vessel traffic safety services which include elements of "the voiceless VTS" (VTS/AIS). PAWSS/VTS includes an automatic means of tracking vessels (AIS) and transmitting essential safety

information digitally, both ship-to-ship and ship-to-shore. The implementation of these systems is essential to improve safety of life, safety of navigation, and protection of the environment. These systems require radio channels implemented in accordance with various international standards and recommendations¹. In addition, the U.S. maritime community has forwarded two reports documenting their requirements for a VTS solution that is consistent port to port, both nationally and internationally.² This service includes the exchange of traffic and harbor data. These systems will take advantage of evolving digital technology in developing the "voiceless VTS" in a spectrum-efficient manner. The U.S. Coast Guard, with assistance from the National Telecommunications and Information Administration, has invested several labor-years in equipment testing and technical submissions to the ITU, to improve spectrum efficiency in this band through the use of 12.5 kHz narrowband channels.

5. Specifically, the U.S. Coast Guard has now included AIS in its requirements for new PAWSS acquisitions and for upgrades to existing VTS systems. For example, the Ports And Waterways Safety System (PAWSS) Draft Specification, which includes as a requirement the implementation of Recommendation ITU-R M.825-2, calls for "AIS working channels". Since it is a safety service, AIS channels must be free from interference from all other (non-AIS) transmissions by both base and mobile equipment.

Dedicated Channels Should Be Unnecessary

6. Because ship and shore AIS systems should be capable of immediate and automatic tuning to any frequency recognized by Appendix 18 of the International Radio Regulations or ITU-R Recommendation 1084, dedicated channels should be unnecessary, and because of the potential for interference to adjacent wideband (25 kHz) channels depending upon location, dedicated channels may be undesired.

¹ Recommendation ITU-R M.1084, Recommendation ITU-R M.825, Report ITU-R M.2010.

² "Baseline VTS Recommendations from: The Ports and Waterways Safety Committee", April 17, 1997; "Summary of Guidance from the National Dialog on Vessel Traffic Services", April 1997.

There is an Urgent Need for AIS Channels

7. The U.S. Coast Guard has immediate plans to implement AIS systems at selected ports and waterways, including Puget Sound (beginning on a limited scale with the state of Washington in 1997), the lower Mississippi River (beginning with PAWSS trials on 50-100 selected vessels in early 1998), and the Houston-Galveston VTS area (with installation planned for early 1998). Other system implementations will follow in the near future. For that reason, access to at least two channels is urgently needed in each of these areas for AIS purposes by the dates an AIS system is put into place. Temporary authorization for the use of these channels until permanent rules are adopted governing the frequencies are adopted, would be acceptable, in order to meet the required dates for these areas.

The Need for Duplex Channels

8. AIS systems operated in the United States need access to duplex channels for two reasons. First, because of the need to protect wideband (25 kHz) users on channels adjacent to a narrowband (12.5 kHz) channel, only duplex channels can be currently, practically used in a narrowband mode. Second, the AIS systems intended for use may require duplex channels to meet the needs for ship-to-ship navigation safety information exchange.

Tests Show Narrowbanding can only be Accomplished Presently using Duplex Channels

9. In the technical standard Recommendation ITU-R M.1084, two methods have been approved for administrations to implement channels from Appendix 18 to support the stated AIS requirements. Both of these methods involve duplex channels. One method considers the simplex use of duplex channels, where the base side "upper leg" frequency is split off and assigned to AIS. The second method is the interleaving of 12.5 kHz narrowband channels within the duplex channels. The FCC has already approved the implementation of these 12.5 kHz channels in the land mobile service, provided that the land mobile stations are removed by a minimum of 150 miles from navigable waterways. FCC regulations have long adopted the simplex use of maritime duplex channels.

- 10. Both of these internationally approved methods have been investigated within the U.S. for the possible implementation of VTS/AIS systems. The first method is not practical, since most of the duplex channels in Appendix 18 in the U.S. have already been split by previous FCC rulemaking, with most of the "coast frequencies" (B-sides) already used for land mobile purposes by railroads, land transportation, "broadcast links", and (for channel 88B) all federal government agencies. Of the 35 duplex channels in Appendix 18, only 9 remain available to maritime in the U.S., and these channels have been assigned to "public correspondence." The second method, the use of interleaved 12.5 kHz channels, was investigated through measurements conducted by the United States Coast Guard and the National Telecommunications and Information Administration (NTIA) in cooperation with the Radio Technical Commission for Maritime Services (RTCM) Special Committee SC101. A draft copy of the report of this investigation is enclosed. Specifically, commercial and recreational grade 25 kHz and 12.5 kHz marine radios were tested in laboratory and field environments for susceptibility to adjacent/interstitial channel interference, and for interoperability.
- 11. The results of these tests showed that the 25 kHz and 12.5 kHz radios can be interoperable. However, introducing new 12.5 kHz radios into the existing 25 kHz environment must be done slowly and very carefully in order to ensure that no interference occurs to users of existing maritime radios. Existing 25 kHz maritime radios will remain in common use for many years, especially among many recreational and small commercial users. Test showed that with most existing maritime radios operating on 25 kHz channels, interference from transmissions on adjacent narrowband channels can be disruptive and serious. Consequently, geographical separation of 11 to 13 miles between adjacently tuned 12.5 kHz radio transmitters and 25 kHz receivers will be necessary in order to prevent interference between users of narrowband and wideband channels. Use of 12.5 kHz channels may not be achievable near 25 kHz channels not

³ "Assessment of Compatibility Between 25 and 12.5 kHz Channelized Marine VHF Radios", draft final report NTIA TR 97-XX, July 1997. This report was coordinated through RTCM SC101, Special Committee on Digital Selective Calling and Automatic Identification Systems, as it was developed. A draft of this report was approved by RTCM SC101 in July 1996. Final review by NTIA is in process. Upon completion it will also be reviewed for approval by RTCM SC101, and it is expected that this process will be completed soon. The USCG will forward to the FCC copies of the final document as approved by both NTIA and RTCM SC101.

exclusively assigned to one user, but shared among a variety of users in the band. For example, use of 12.5 kHz channels near existing 25 kHz simplex channels which allow all base and mobile stations to participate with each other during communications may not be presently possible. Separating transmitters operating on narrowband channels from receivers operating on adjacent wideband channels can be done practically only with existing duplex channels, since their use is restricted to base stations whose geographical locations are known and licensed. The only VHF maritime channels existing in the U.S. that are candidates for implementing narrowband operations on 12.5 kHz are from the existing 25 kHz public correspondence duplex channels, and 228B (162.0125 MHz).

AIS Systems Require the Use of Duplex Channels

12. As noted above, if duplex channels are not available for AIS, the base station transmissions could not be assured to be free from interference from transmissions by mobile stations. Furthermore, it would not be possible to provide the repeater boost that may be needed for wide-area coverage of ship-to-ship position and other data messages. ITU-R Recommendation M.825-2, for example, contains a provision for using a duplex channel for shore-assisted broadcasting of ships position data to other ships. Users who could benefit from the commercial advantages of such a system would be more likely to support a safety system such as PAWSS/VTS.

Channel 228B (162.0125 MHz) Proposal

13. Since channel 228B (162.0125 MHz) straddles the non-government and the federal government band, we propose its use be allowed for maritime mobile purposes, including data purposes, as a shared government/non-government channel, with assignments approved by both FCC and the National Telecommunications and Information Administration (NTIA). The U.S. Coast Guard will coordinate this proposal within NTIA and its Interdepartment Radio Advisory Committee. Since Channel 88A (157.425 MHz) is used as a simplex channel in the U.S., use of channel 228A (157.4125 MHz) should presently not be authorized in U.S. waters.

General Technical Standards

14. The U.S. Coast Guard recommends that Part 80 of the Commission's rules be amended to allow radio equipment to operate in the 12.5 kHz channels specified in paragraph 15 below in accordance with ITU-R Recommendation M.1084 Annex 2 and 3, using voice or data modulation, Part 80 power limitations, and emission limitations in accordance with existing Commission rules for 12.5 kHz mobile radio systems.

U.S. Coast Guard Proposal

15. The U.S. Coast Guard requests that the FCC make available interleaved 12.5 kHz channels between public correspondence Channels 24, 84, 25, 85, 26, 86, 27, 87, and 28, for AIS and related PAWSS and VTS upgrade purposes on a shared basis with public correspondence or other uses, on a coordinated need-determined basis, with at least two channels kept available for AIS or AIS related purposes in any given area. The U.S. Coast Guard also requests that the 12.5 kHz channel 228B (162.0125 MHz) also be made available, on a shared government/non-government basis. Because of the immediate need for AIS systems, temporary authorization of these channels should be permitted until the Commission makes a final decision in this matter. Maritime ship and coast radio equipment should be authorized to operate in these bands.

Respectfully Submitted,

Joseph D. Hersey, Jr. Chief, Spectrum Management Division

By Direction of the Commandant

Commandant (G-SCT)
United States Coast Guard
Washington, D.C. 20593-0001

August 1, 1997

Enclosure: NTIA draft final report, Assessment of Compatibility Between 25 and 12.5 kHz Channelized Marine VHF Radios

Assessment of Compatibility Between 25 and 12.5 kHz Channelized Marine VHF Radios

Robert L. Sole Frank H. Sanders Brent Bedford

Draft Copy



U.S. DEPARTMENT OF COMMERCE William H. Daley, Secretary

Larry Irving, Assistant Secretary for Communications and Information

July 1997

Executive Summary

The maritime mobile frequency band supports maritime communications worldwide. Appendix 18 of the ITU Radio Regulations (RR) defines the channels of the maritime mobile service. These channels support a variety of communication functions including: public correspondence, intership and ship-to-coast, coast- to-ship, port operations, calling and various safety purposes. Safety functions include distress, search and rescue, ship movement, navigation (bridge-to-bridge) communications, and maritime safety information broadcasts.

Additional maritime mobile channels are required to meet the growing demands for the above services in the near future, particularly the demand for digital services. To accommodate the old and new services demand for additional channels, the maritime mobile spectrum needs to be used more efficiently. Narrowbanding of the maritime mobile VHF band from 25 kHz to 12.5 or 6.25 kHz channel bandwidths is one possible solution to make more channels available. However, any technique must take into account factors such as continuing to make low-cost transceivers available to the general boating public and preserving interoperability with existing 25 kHz FM equipment. They must also consider the time period in which these targeted improvements can be achieved. Furthermore, any new technology used to reduce spectrum congestion and improve spectrum efficiency must be able to accommodate existing safety and distress communications.

The United States plans to submit a proposal in the upcoming 1997 World Radio Conference (WRC -97) to permit narrowbanding the maritime mobile VHF band. To support that proposal, the United States Coast Guard and the National Telecommunications and Information Administration (NTIA) conducted bench and radiated tests of 25 kHz (referred to as wideband) and 12.5 kHz (referred to as narrowband) channelized marine radios. Commercial and recreational grade wideband and narrowband radios were tested for susceptibility to intermodulation products and adjacent/interstitial channel interference, and for interoperability. The narrowband radios were prototype commercial grade radios that were not fully optimized for narrowband operation. In addition, a VTS ship transponder receiver (as defined in ITU-R M.825) was tested for susceptibility to adjacent channel interference.

The results of the intermodulation tests showed that commercial grade radios are less susceptible to intermodulation products than the recreational grade radios. The results of the adjacent/interstitial channel interference tests showed that the narrowband radios were less susceptible to adjacent /interstitial interference than the wideband radios, both commercial and recreational grade. The results of the VTS ship transponder tests showed that the transponder receiver performed well in the presence of adjacent channel interference. The results of the interoperability tests showed that the wideband radios are fully interoperable with narrowband radios, with a slight degradation in the operating range of a wideband receiver.

Although the results of the tests showed that the wideband and narrowband radios are interoperable, introducing narrowband radios into the existing 25 kHz environment must be carefully done to minimize the effects of adjacent channel interference on wideband receivers. This is especially true when the narrowband radio is operating on an interstitial channel ±12.5 kHz off-tuned from a regular 25 kHz channel. One method that would help, but not totally eliminate, adjacent channel interference is to ensure geographic separation between adjacently tuned narrowband radio transmitters and wideband receivers. However, this may not be achievable in the entire maritime band due to the fact that most of the frequency channels in the band are not exclusively assigned but shared among a variety of users in the band. Initially, implementing separation distances to allow narrowband operations could be done by those maritime users that have greater control over who uses their services and who can afford narrowband capable equipment.

The range of distances that would be needed for geographic separation for adjacently tuned wideband and narrowband radios were calculated based on data from the bench tests. The results show that for 12.5 kHz of frequency separation from a 25 watt transmitter, the wideband radio required about 12 nmi of separation and the narrowband radio required about 6 nmi of separation to satisfy the test requirements. These results indicate that the narrowband radio was more immune to adjacent channel interference than the wideband radio. The aforementioned separation distances assume minimal degradation in receiver sensitivity for the mobile units. Operational base stations should observe larger separation distances, especially if the working frequencies with mobile units are simplex. Interoperability distances based on data from the bench tests showed that the wideband receiver lost about 3 nmi of operating range when communicating with a narrowband radio, as compared to a wideband radio. The narrowband receiver did not suffer any degradation in operating range when communicating with the wideband transmitter, as compared to communicating with a narrowband transmitter.

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Section 1 Introduction

1.1 Background

The maritime mobile frequency band (156-174 MHz) supports maritime communications worldwide. Appendix 18 of the ITU Radio Regulations (RR) defines the channels of the maritime mobile service. These channels support a variety of communication functions including: public correspondence, intership and ship-to-coast, coast- to-ship, port operations, calling and various safety purposes. Safety functions include distress, search and rescue, ship movement, navigation (bridge-to-bridge) communications, and maritime safety information broadcasts.

Although not used extensively, data communications are also available on some channels by arrangement between administrations. Provisions in Appendix 18 consider the use of high-speed data and facsimile transmissions. The Radio Regulations, primarily Articles 59 and 60, provide technical characteristics for these functions. Most communications in the maritime mobile service utilize analog FM techniques for voice communications, although requirements for digital information exchange are expected to increase in the future.

Public coast station operators have an increased need for additional spectrum with the introduction of semi-automatic and automatic direct dial services in the U.S. Administrations where these services have been introduced have generally seen an increase of 10-20 fold in the amount of ship-to-shore and shore-to-ship traffic. In order to facilitate the proper implementation of automated services, the need for additional operating channels is necessary.

In addition, administrations implementing modern vessel traffic services (VTSs) using such techniques as automated dependent surveillance (ADS) will need internationally compatible radio channels set aside for data transmission. This includes the exchange of traffic and harbor data. VTS systems will take advantage of evolving digital technology moving towards developing a "voiceless" VTS.

To accommodate the maritime mobile service needs for more channels, the maritime mobile band needs to be used more efficiently. Narrowbanding of the maritime mobile VHF band from 25 kHz to 12.5 or 6.25 kHz channel bandwidths is one possible solution to making more channels available to the services described above. However, this technique must take into account factors such as continuing to make low-cost transceivers available to the general boating public and preserving interoperability with existing 25 kHz FM equipment. They must also consider the time period in which these targeted improvements can be achieved.

Furthermore, any new technology used to reduce spectrum congestion and improve spectrum efficiency must be able to accommodate existing safety and distress communications. Channel plans and modulation schemes for both new and existing transceivers must be interoperable and capable of immediately participating in the VHF maritime distress and safety system if narrowbanding is implemented.

The United States will submit a proposal in the upcoming 1997 World Radio Conference (WRC -97) to permit narrowbanding the maritime mobile VHF band. To support that proposal, the United States Coast Guard and the National Telecommunications and Information Administration (NTIA) conducted bench and radiated tests of 25 and 12.5 kHz channelized marine radios. In addition, adjacent channel interference susceptibility tests were performed on a VTS-like transponder system. Reports documenting results of the bench and radiated tests were

Section 1 Introduction

distributed to the maritime industry for review and comment through the Radio Technical Commission for Maritime Services (RTCM). This report summarizes the objectives, procedures, and results of both the radiated and bench tests.

The VHF radio and transponder bench and radiated test objectives, procedures, and results are discussed in the following sections. Radiated tests were performed in a maritime environment in the South Florida area during August 1996. The bench tests were completed in April 1996 at the ITS laboratory in Boulder, Colorado.

1.2 Test Objectives

The objectives when testing the VHF radios on a bench and in a maritime environment were to: 1) Determine the susceptibility of 12.5 and 25 kHz channelized radios to adjacent/interstitial channel interference, and 2) Evaluate the interoperability of the 12.5 and 25 kHz channelized radios. The bench tests also included testing the 25 and 12.5 kHz radio's susceptibility to intermodulation products. The objective of the intermodulation tests was to evaluate the radios susceptibility to 3rd and 5th order intermodulation products with pairs of frequencies located in the marine band and out-of the marine band. The objective of testing the transponder was to evaluate its performance in the presence of adjacent/interstitial channel interference.

During the radiated tests it was decided to perform additional tests beyond those described in the original test plan circulated through RTCM. The procedures used in those tests and their results are discussed in section 2.1.4 of this report.

1.3 Test Radios

Production radios used for testing were commercially available analog 25 kHz channelized marine FM radios. These 25 kHz radios included three commercial grade radios representative of the type used by commercial boaters and government agencies.

Most recreational boaters use less expensive low-end 25 kHz radios. These types of radios could possibly be more susceptible to interference and interoperability problems and were therefore also tested. NTIA purchased three fixed mount and two hand-held radios of these types from local retailers for testing.

One manufacturer supplied two prototype 12.5 kHz channelized radios for the tests, one was configured as a mobile and the other as a base unit. These radios are not yet commercially available. The radios are identified by alphabetical code using letters A through K, manufacturers' names and model numbers are not included in this report. These radios are also identified in the bench test report using the same letter. The radio are categorized as either recreational or commercial grade radios and as either fixed-mount or handheld below in table 2-1.

The 25 kHz channelized radios will be referred to as wideband radios and the 12.5 kHz radios will be referred to as narrowband radios for the remainder of this report.

Table 2-1 Radio Description

| Radio | Туре | Grade |
|-------|----------------------------|---------------------------|
| A | fixed-mount 25 kHz | recreational |
| В | fixed-mount 25 kHz | commercial |
| С | fixed-mount 25/12.5 kHz | commercial (prototype) |
| D | fixed-mount 25/12.5 kHz | commercial (prototype) |
| E | hand-held 25 kHz | recreational |
| F | fixed-mount 25 kHz | commercial |
| G | hand-held 25 kHz | recreational |
| Н | fixed-mount 25 kHz | recreational |
| Ι | fixed-mount 25 kHz | recreational |
| J | fixed-mount 25/12.5 kHz | commercial (prototype) |
| K | fixed-mount 25 kHz | recreational |

The tests were performed according to the radio's mode of operation (base or mobile) and their channel numbering plan (25 or 12.5 kHz). The proposed channel numbering plan used by the prototype 12.5/25 kHz radios is defined in ITU Study Group 8B document 8B-TEMP/6Rev.1 (Draft Revision of Recommendation ITU-RM.1084, "Improved Efficiency in the Use of the Band 156-174 MHz by Stations in the Maritime Mobile Service"). This proposed channel numbering plan was used in this report to denote the channels used for testing.

This recommendation was approved at the international Working Party 8B meeting held in November 1996 and was approved by Study Group 8 in June 1997.

2.1 Adjacent Signal Susceptibility Tests

The recorded data and test procedures used in the adjacent signal susceptibility bench and radiated tests are described in Appendix A. The following paragraphs summarize the results of the adjacent signal susceptibility tests.

2.1.1 Bench Tests

The results of adjacent signal interference bench tests show that wideband receivers are susceptible to narrowband interferers when the narrowband interferer is off-tuned ±12.5 kHz from the desired signal carrier. However, wideband receivers are less susceptible to narrowband interferers than wideband interferers when the narrowband interferers are off-tuned by at least 25 kHz from the desired signal carrier. For example, receiver A in Table A-1 required an interference power of -59 dBm from a wideband interferer off-tuned 25 kHz to degrade the SINAD from 15 to 12 dB but, as shown in Table A-2, -55 dBm was required for receiver A with a narrowband interferer off-tuned 25 kHz. Receiver A required 4 dB more of interference power from the narrowband interferer than the wideband interferer to degrade the SINAD from 15 to 12 dB. Although this number varies for each radio, it is true in all cases. Clearly, once the narrowband interferer is off-tuned 25 kHz and beyond, the narrow band interferer is less of a concern than the wideband interferer.

These results indicate that narrowband radio transmitters would not adversely affect wideband radio receivers operating 25 kHz and beyond from the narrowband transmitter. However, geographical separation or sharper filtering in the wideband receiver would be necessary if the wideband receiver was operating 12.5 kHz off-tuned from the narrowband transmitter. The cost of additional filtering in the receiver and tighter frequency tolerances should present only a moderate price increase to the overall cost of the radio.

The results of adjacent signal interference tests on narrowband receivers show they are less susceptible to wideband interferers than wideband receivers are to narrowband transmitters. For example, receiver A (a 25 kHz radio) in Table A-2 required an interference power of -97 dBm to degrade the SINAD from 15 to 12 dB when the narrowband interferer was off-tuned -12.5 kHz from the desired signal and -99 dBm for +12.5 kHz off-tuning. The desired signal power for a 15 dB SINAD for receiver A was -114 dBm. The resulting signal-to-interference (S/I) ratios are -17 and -15 dB.

Receiver C (a 12.5 kHz radio) in Table A-7 required an interference power of -86 dBm to degrade the SINAD from 15 to 12 dB for a wideband interferer off-tuned -12.5 kHz and -82 dBm for 12.5 kHz off-tuning. The desired signal power for a 15 dB SINAD for receiver C was -117 dBm. The resulting S/I ratios are -31 dB and -35 dBm.

Comparing the S/I ratios of the wideband and narrowband receivers, it can be seen that the narrowband radio (receiver C) has 14 dB better immunity to the wideband interferer than the wideband radio (receiver A) has to the narrowband interferer. Although the S/I ratios are different for each receiver, this is true for all cases of wideband receivers versus the narrowband receiver.

These results indicate that narrowband receivers could operate in a wideband environment as well as wideband radios on 25 kHz channels but would require some geographical separation if they were operating on an interstitial channel 12.5 kHz off-tuned from a regular 25 kHz channel. The geographical separation distances for adjacently tuned wideband and/or narrowband radios are discussed in section 2.1.3. The distances were calculated

using the NTIA NLAMBDA computer propagation model for smooth earth at 50 percent.

2.1.2 Radiated Tests

The results of the adjacent signal interference susceptibility tests show that the narrowband radio was more immune to adjacent channel interference than the wideband radios. The S/I ratio for the narrowband radio was -35 dB whereas the best S/I ratio for the wideband radios (shown in Table A-11) was -10 dB, which was determined for receiver B. Receiver G had the worst S/I of +12. These results were expected and agreed with the results of the bench tests which also showed that the 12.5 kHz receiver with a narrower IF bandwidth is more immune to adjacent channel interference than current wideband radios.

2.1.3 Adjacent Channel Separation Distances

Average channel separation distances for a wideband receiver were calculated based on the separation distances for each wideband receiver. The distances were calculated for a wideband receiver versus adjacently tuned wideband and narrowband transmitters off-tuned by 25 kHz, and for a narrowband transmitter off-tuned by 12.5 kHz. The power of the adjacent transmitters was 25 watts and three cases of antenna heights were considered: 3 meters, 3 and 10 meters, and 10 meters. The distances were calculated based on the data in Tables A-1 and A-2 of Appendix A and the methodology described in Appendix E. The results are shown below in Table 2-1.

Table 2-1
Wideband Receiver Average Adjacent Channel Separation Distances (25w)

| Antenna Heights | Δf=25 | Δf=12.5 kHz | |
|--------------------|-------------------------------|------------------------------------|---------------------------------|
| | 25 watt 25 kHz Transmitter | 25 watt 12.5 kHz Transmitter | 25 watt 12.5 kHz Transmitter |
| H1=3 m H2=3 m | 1.7 nmi | 1.3 nmi | 11.9 nmi |
| H1=3 m H2=10 m | 1.9 nmi | 1.7 nmi | 12.6 nmi |
| H1=10 m H2=10m. | 1.9 nmi | 1.7 nmi | 13.7 nmi |

As shown in column three of Table 2-1, the separation distances for the wideband receivers versus a narrowband transmitter, off-tuned by 25 kHz, are equivalent to the separation distances for a wideband transmitter off-tuned by 25 kHz which are shown in column two. However, the separation distances for the wideband receiver increase when the narowband transmitter is tuned to the adjacent interstitial channel. The maximum value is 13.7 nautical miles for a transmit and receive antenna height of 10 meters. The variability in the separation distances relative to the average values shown in Table 2-1 for the individual radios was about .4-1

nautical miles for the wideband and narrowband interferers off-tuned by 25 kHz and about 1.7-2.6 nautical miles for the narrowband interferer off-tuned by 12.5 kHz.

Separation distances for a 5 watt transmitter versus a wideband receiver are shown below in Table 2-2.

Table 2-2
Wideband Receiver Average Adjacent Channel Separation Distances (5w)

| Widebuild Receiver Arverage Adjacone Chamber Separation Distances (51) | | | | | |
|--|---------------------------------|-----------------------------------|-----------------------------------|--|--|
| Antenna Heights | Δf=2 | Δf=12.5 kHz | | | |
| | 5 watt 25 kHz Transmitter | 5 watt 12.5 kHz Transmitter | 5 watt 12.5 kHz Transmitter | | |
| H1=3 m H2=3 m | 1.3 nmi | 1.3 nmi | 8.4 nmi | | |
| H1=3 m H2=10 m | 1.3 nmi | 1.3 nmi | 9.0 nmi | | |
| H1=10 m H2=10 m | 1.3 nmi | 1.3 nmi | 9.8 nmi | | |

Separation distances for a 1 watt transmitter versus a wideband receiver are shown below in Table 2-3.

Table 2-3
Wideband Receiver Average Adjacent Channel Separation Distances (1w)

| Antenna Heights | Δf=2: | Δf=12.5 kHz | |
|---------------------|--|-------------|-----------------------------------|
| | 1 watt 25 kHz 12.5 kHz Transmitter Transmitter | | 1 watt 12.5 kHz Transmitter |
| H1=3 m H2=3 m | .9 nmi | .9 nmi | 5.8 nmi |
| H1=3 m. H2=10 m. | .9 nmi | .9 nmi | 6.3 nmi |
| H1=10 m H2=10 m. | .9 nmi | .9 nmi | 6.9 nmi |

Table 2-1 represents the situation for a fixed mount transmitter versus a wideband receiver. Tables 2-2 and 2-3 represent the situation for a handheld transmitter versus a wideband receiver. In addition, Tables 2-2 and 2-3 could also represent a wideband receiver versus a fixed transmitter limited to low power operation on certain channels.

Adjacent channel separation distances were also calculated for a narrowband receiver

versus a wideband transmitter off-tuned by 12.5 kHz. The power of the adjacent transmitter was 25, 5, and 1 watt. Three cases of antenna heights were considered: 3 meters, 3 and 10 meters, and 10 meters. The distances were calculated based on the data in Table A-7 of Appendix A and the methodology described in Appendix E. The results are shown below in Table 2-4.

| Table 2-4 |
|---|
| Narrowband Receiver Adjacent Channel Separation Distances |

| tarrowound Receiver Rejucent Chainter Separation Distance | | | | | | |
|---|----------------------------------|---------------------------------|---------------------------------|--|--|--|
| Antenna Heights | Δf=12.5 kHz | Δf=12.5 kHz | Δf=12.5 kHz | | | |
| | 25 watt 25 kHz Transmitter | 5 watt 25 kHz Transmitter | 1 watt 25 kHz Transmitter | | | |
| H1=3 m H2=3 m | 6.2 nmi | 4.3 nmi | 3.0 nmi | | | |
| H1=3 m H2=10 m | 6.7 nmi | 4.7 nmi | 3.5 nmi | | | |
| H1=10 m H2=10 m | 7.1 nmi | 5.2 nmi | 3.5 nmi | | | |

Comparing the entries of column two in Table 2-4 and column four in Table 2-1 it can be seen that the narrowband receiver has a smaller separation distance versus a wideband transmitter off-tuned by 12.5 kHz than vice-versa. For example, the separation distance for the narrowband receiver versus the wideband transmitter for antenna heights of 10 meters is 7.1 nautical miles. However, in the case of the wideband receiver versus the narrowband transmitter off-tuned by 12.5 kHz (using the same antenna heights) the separation distance is 13.7 nautical miles. Clearly the prototype narrowband radio which uses 15 kHz wide IF filters is more immune to adjacent channel interference than current production wideband radios that employ wide band IF's. The narrowband radios could be made even further immune to adjacent channel interference if the IF bandwidths were reduced to 10 kHz.

2.1.4 Additional Radiated Tests

Additional radiated tests were conducted using voice as the modulating signal for both the interferer and desired signal transmitter. These tests were observed by attendees of the RTCM conference. The results of these tests showed that an adjacently tuned interferer modulated by voice could degrade performance of a voice communication link.

The results of the tests using voice-shaped noise versus voice as the modulating signal for the interferer cannot be directly compared. The radiated test with the voice-shaped noise as the interfering signal modulation used a 1 kHz tone to modulate the desired signal radio to conduct a SINAD test. The SINAD test is a quantitative test that has a set goal for its results, which in our tests was 15 dB without interference to 12 dB with interference. The radiated test with voice as the modulating signal for the interferer and the desired signal transmitter was a qualitative test with no direct measurement of voice or message intelligibility attempted.

Section 2 Test Results

The goal of the quantitative test was to introduce interference into the communication link which would lower the SINAD. Lowering of the SINAD indicates that the performance of the communication link has suffered some degradation. This was done by placing the vehicle containing the interferer radio at a specific geographical location. With the interference being put into the link, the 1 kHz tone could still be heard from the receiver being tested, along with noise in the background. The background noise was due to the interferer being modulated by the VSN. When the qualitative test was done with the interferer staying at that same location but using voice as a modulator, one would expect to hear voice as the background interference.

2.2 Interoperability Tests

The recorded data and test procedures used in the interoperability bench and radiated tests are described in Appendix B. The following paragraphs summarize the results of the interoperability tests.

2.2.1 Bench Tests

The results of the interoperability tests of a narrowband transmitter and wideband receivers varied from radio to radio. Radio F in Table B-1 required -116 dBm of power from a narrowband transmitter to produce a 15 dB SINAD and -116 dBm of power from a wideband transmitter. However, radio G required -110 dBm of power from a narrowband transmitter and -115 dBm of power from a wideband transmitter to produce a 15 dB SINAD in the receiver, a difference of 5 dB. The other radios in Table B-1 required more power from the narrowband transmitter than the wideband transmitter to produce the 15 dB SINAD.

In a marine environment, these differences in wideband receiver sensitivity to 25 and 12.5 kHz transmitters would equate to some wideband radios having a reduced operating range when communicating with narrowband radios. Some of this is due to the narrowband transmitter having a 2 kHz signal deviation while the wideband transmitter was set to a 3 kHz signal deviation. With a lesser signal deviation, the narrowband signal contained less energy for the wideband receiver to demodulate.

The results of the interoperability tests of a narrowband receiver with a wideband transmitter in Table B-2 showed that the narrowband radio receiver required -117 dBm from a narrowband transmitter and -119 dBm from a wideband transmitter to produce a 15 dB SINAD. Therefore, properly designed narrowband radio receivers should be compatible with wideband transmitters with little loss of operating range.

2.2.2 Radiated Tests

The results of the interoperability tests listed in Table 5-3 showed that the wideband receivers were compatible with the narrowband transmitter. The difference for the received desired signal power from the narrowband and wideband transmitters at the input to the radio being tested to achieve a 15 dB SINAD varied from 2 to 10 dB.

2.2.3 Interoperability Distances

Average interoperability distances for a wideband receiver (e.g., the distance at which a 15 dB SINAD can be attained) were calculated based on the interoperability distances for each wideband receiver. The distances were calculated for a wideband receiver communicating with wideband and narrowband radios transmitting at powers of 25, 5, and 1 watt for three cases of

antenna heights: 3 meters, 3 and 10 meters, and 10 meters. The distances were calculated based on the desired signal powers contained in columns two and three of Table B-1 in Appendix B and the methodology described in Appendix E. The average interoperability distances, in nautical miles, for the wideband receivers communicating with wideband and narrowband transmitters are shown below in Table 2-5.

Table 2-5
Wideband Receiver Average Interoperability Distances

| ļ | Pt = 25 | 5 Watts | Pt= 5 Watts | | Pt=1 Watt | |
|----------------------|-----------------------|-------------------------|-----------------------|-------------------------|-----------------------|-------------------------|
| Antenna Heights | 25 kHz Transmitter | 12.5 kHz Transmitter | 25 kHz Transmitter | 12.5 kHz Transmitter | 25 kHz Transmitter | 12.5 kHz Transmitter |
| H1= 3 m H2= 3 m | 26 nmi | 23 nmi | 20 nmi | 18 nmi | 15 nmi | 13 nmi |
| H1= 3 m H2= 10 m | 28 nmi | 25 nmi | 21 nmi | 19 nmi | 16 nmi | 14 nmi |
| H1= 10 m H2= 10 m | 29 nmi | 26 nmi | 23 nmi | 20 nmi | 17 nmi | 15 nmi |

As shown in columns two through six of Table 2-5, the wideband receiver will have a minimal loss of operating range when communicating with a narrowband transmitter, as compared to a wideband transmitter operating at the same power output and antenna heights. On average, the wideband receiver will only experience 2 to 3 nautical miles of degradation in operating range when communicating with the narrowband transmitter. The variability in the interoperability distances for the individual wideband radios relative to the averages shown in Table 2-5 was about 3.5 nautical miles for the wideband transmitter and about 3.5 miles for the narrowband transmitter.

Interoperability distances were also calculated for a narrowband receiver communicating with a wideband and a narrowband radio transmitting at powers of 25, 5, and 1 watt. Three antenna heights were considered: 3 meters, 3 and 10 meters, and 10 meters. The distances were calculated based on the desired signal powers contained in columns two and three of Table B-2 in Appendix B and the methodology described in Appendix E. The average interoperability distances, in nautical miles, for the narrowband receiver communicating with wideband and narrowband transmitters are shown below in Table 2-6.

| | Pt = 25 | 5 Watts | Pt= 5 Watts | | Pt=1 Watt | |
|----------------------|-----------------------|-------------------------|-----------------------|-------------------------|-----------------------|-------------------------|
| Antenna Heights | 25 kHz Transmitter | 12.5 kHz Transmitter | 25 kHz Transmitter | 12.5 kHz Transmitter | 25 kHz Transmitter | 12.5 kHz Transmitter |
| H1= 3 m H2= 3 m | 29 nmi | 27 nmi | 23 nmi | 21 nmi | 17 nmi | 15 nmi |
| H1= 3 m H2= 10 m | 30 nmi | 29 nmi | 24 nmi | 22 nmi | 18 nmi | 16 nmi |
| H1= 10 m H2= 10 m | 32 nmi | 30 nmi | 25 nmi | 23 nmi | 19 nmi | 17 nmi |

Table 2-6
Narrowband Receiver Interoperability Distances

As shown in columns two through six of Table 2-6, the narrowband receiver will not experience any loss of operating range when communicating with a wideband transmitter, as compared to a narrowband transmitter operating at the same output power and antenna heights.

These interoperability distances show that wideband receivers should be compatible with narrowband transmitters and vice-versa, with minimal effect on the operating range of either type of radio.

2.3 Intermodulation Susceptibility Tests

The recorded data and the procedures used to perform the intermodulation susceptibility tests are described in Appendix C. The following paragraphs summarize the results of the tests.

The results of the 3rd order intermodulation susceptibility tests with wideband receivers showed a wide range of intermodulation rejection (IMR) values between manufacturers and price range of radios. In addition, the IMR for each radio varied if the pairs of signals generating the intermodulation products were in the receiver's RF passs band, or out-of the receiver's RF pass band. For example, in Table C-1 receiver A (a recreational grade wideband radio) had an in-band IMR of -63 dB and from Table C-2 an out-of-band IMR of -68 dB. Receiver B, a commercial grade wideband radio, had an in-band IMR of -81 dB but saturated before a measurement could be made on the out-of-band IMR.

The results of these tests indicate that front-end filtering in the radios lessen their susceptibility to out-of-band signals that cause the intermodulation products in the radio receiver. Radio A's out-of-band response was 5 dB better than its in-band response. The amount of additional IMR rejection for the out-of-band signal pairs is dependent on the radio being tested.

A more important result is the difference between commercial grade and recreational grade radios for the in-band IMR response. In this case the difference between receivers A and B is 18 dB. In a maritime situation, this difference in IMR performance would translate into radio B having a greater operational range than radio A, when a paging transmitter (158.700 MHz) and a rail/dock transmitter (161.025 MHz) were active in the area. Although the IMR varied from radio to radio, the commercial grade radios always had a better IMR than the recreational grade radios in these tests. The results of the 5th order intermodulation susceptibility tests with wideband receivers (shown in Tables C-3 and C-4) revealed that most radios, both commercial and recreational grade, saturated before the intermodulation effects could be generated and

verified. This was true for the in-band and out-of-band signal pairs response. However, when a 5th order IMR was measured its value was better than the 3rd order IMR response. For example, radio A's 5th order IMR was 10 dB better than its 3rd order IMR for both the in-band and out-of-band signal pairs.

The results of the 3rd order intermodulation susceptibility tests with narrowband receivers (radio C in Tables C-1 and C-2) showed that it had a better in-band and out-of-band IMR than the recreational grade 25 kHz radios. As in the case of the 25 kHz radios, the out-of-band IMR was greater then the in-band IMR. The in-band IMR was measured to be -77 dB and the out-of-band IMR was -84 dB. These IMR's were on par with the commercial grade wideband radios. This result was not unexpected because the radio was a prototype of a commercial grade narrowband radio. The manufacturer claims that production narrowband radios will come close to a -90 dB IMR.

Recreational grade narrowband radios were not available for this test, but should be tested if they go into production. Currently, the FCC does not mandate IMR performance standards for marine VHF radios sold in the United States. Many European nations require that marine radios sold in their country adhere to the International Electrotechnical Comission (IEC) IMR specification of -68 dB. This level was easily met by commercial grade radios in the tests but could be a problem for recreational grade radios.

2.4 VTS-Like Transponder Tests

The recorded data and the procedures used to perform the transponder tests are described in Appendix D. The following paragraphs summarize the results of the tests.

The results of the adjacent signal interference susceptibility tests on the transponder showed that the dominant interference mechanism was front end saturation of the transponder receiver. Receiver saturation generally occurs at high interference power levels which equates to a higher degree of immunity to interference.

These test results show that, with a strong desired signal, this particular VTS-like transponder receiver was able to operate within the system with a high degree of immunity to adjacent signal interference.

2.4.1 VTS-Like Transponder Adjacent Channel Separation Distances

The VTS-like transponder receiver operating on an interstitial channel would require less than one quarter of a nautical mile of separation from a transmitter operating on the adjacent regular marine channel (12.5 kHz of frequency separation). This assumes the VTS-like transponder receiver has a strong desired signal (-60 dBm) and the interferer radio is transmitting with an output power of 25 watts.

3. General Conclusions

From reviewing the results of the bench and radiated tests, it should be possible to introduce radios and/or VTS like systems on 12.5 kHz channels provided that proper frequency management techniques such as geographical separation and/or receiver standards are implemented. A further discussion of each topic is given in the following paragraphs.

Geographical separation is an option that accommodates narrowband operations for specific licensed and/or assigned marine VHF operations, such as public coast stations and government operations. Public coast stations are licensed by the FCC and protected to a 17 dBuV contour to prevent interference from occurring between competitors on adjacent sites/channels. Public coast station operators that have licenses on adjacent VHF channels in the same area could use the interstitial between them as data or communication channels. In cases where multiple coast station licensees operate in the same area, the interstitial channels could still be used as long as coordination is performed between the interested parties.

Government radio communications operations in certain frequency bands are internally coordinated and licensed, therefore implementation of 12.5 kHz channels by government users can be conducted by using proper frequency management techniques such as geographic separations and/or exclusive use of 12.5 kHz equipment. This situation is similar to the land mobile implementation of interstitial 12.5 kHz channels into the existing 25 kHz environment in the 162-174 MHz and 406-420 MHz frequency bands.

Separation distances based on bench test results show that to achieve electromagnetic compatibility with geographic separation, wideband radios with wide IF receivers would require about 11-13 nautical miles of separation from radios operating on adjacent narrowband channels. The receivers of the prototype narrowband radios with narrower IF bandwidths are more resistant to interference. These types of receivers would require about 6-7 nautical miles of geographic separation. These distances are based on a transmit power of 25 watts and would be smaller if the power was reduced. The receivers of the VTS-like transponders are even more resistant to interference and would require less than a quarter mile of geographic separation to achieve electromagnetic compatibility.

Receiver standards are another option that could help implement narrowband operations in the marine VHF band. Current wideband marine radios used in the tests employ IF bandwidths as wide as the channel spacing of 25 kHz. The prototype narrowband radios used in the tests were designed with 15 kHz wide IF's to be compatible with both wide band and narrowband operations. They were found to be less susceptible to adjacent channel interference than the current wideband designs that use wide IF filters. Future 25/12.5 kHz radios could be designed with narrower IF's for better performance in the presence of interference without sacrificing receiver sensitivity or range.

In addition, the manufacturer of the prototype narrowband radios has suggested that separate IF filters could be used on narrowband channels. The channel space of a narrowband channel is 12.5 kHz. The IF filter does not need to be as wide as the channel spacing and could be reduced to approximately 10 kHz. This would further reduce its susceptibility to adjacent channel interference.

Receiver intermodulation rejection standards could also be used by manufacturers as guidelines when developing future marine VHF radios.